

**United States District Court
Southern District of Georgia
SAVANNAH DIVISION**

JAMEKA K. EVANS

v. Plaintiff

GEORGIA DEPT OF BEHAVIORAL
HEALTH AND DEVELOPMENTAL
DISABILITIES, ET AL.

Defendants

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Case No. 415-103

RULE 26(f) REPORT

1. Date of Rule 26(f) conference: 10/04/2018

2. Parties or counsel who participated in conference:
Gregory R. Nevins for Plaintiff
Katherine P. Stoff for Defendants

3. If any defendant has yet to be served, please identify the defendant and state when service is expected.
N/A

4. Date the Rule 26(a)(1) disclosures were made or will be made: 10/18/2018

5. If any party objects to making the initial disclosures required by Rule 26(a)(1) or proposes changes to the timing or form of those disclosures,
 - (a) Identify the party or parties making the objection or proposal:
N/A

 - (b) Specify the objection or proposal:
N/A

6. The Local Rules provide a 140-day period for discovery. If any party is requesting additional time for discovery,

(a) Identify the party or parties requesting additional time:

N/A

(b) State the number of months the parties are requesting for discovery:

N/A months

(c) Identify the reason(s) for requesting additional time for discovery:

_____ Unusually large number of parties
_____ Unusually large number of claims or defenses
_____ Unusually large number of witnesses
_____ Exceptionally complex factual issues
_____ Need for discovery outside the United States
_____ Other: _____

(d) Please provide a brief statement in support of each of the reasons identified above:

N/A

7. If any party is requesting that discovery be limited to particular issues or conducted in phases, please

(a) Identify the party or parties requesting such limits:

N/A

(b) State the nature of any proposed limits:

N/A

8. The Local Rules provide, and the Court generally imposes, the following deadlines:

Last day for filing motions to add or join parties or amend pleadings	60 days after issue joined
Last day to furnish expert witness report by plaintiff	60 days after Rule 26(f) conference
Last day to furnish expert witness report by a defendant	90 days after Rule 26(f) conference (or 60 days after the answer, whichever is later)
Last day to file motions	30 days after close of discovery

If any party requests a modification of any of these deadlines,

(a) Identify the party or parties requesting the modification:

Plaintiff and Defendants.

(b) State which deadline should be modified and the reason supporting the request:

Plaintiff and Defendants request 14-day extensions to the standard deadlines to furnish expert witness reports. The parties request these extensions to avoid conflicts with observed holidays. For Plaintiff 12/17/2018 and for Defendants 01/16/2019.

9. If the case involves electronic discovery,

(a) State whether the parties have reached an agreement regarding the preservation, disclosure, or discovery of electronically stored information, and if the parties prefer to have their agreement memorialized in the scheduling order, briefly describe the terms of their agreement:

To the extent necessary and feasible, where an issue with electronic discovery arises the parties have agreed to meet and confer prior to filing motions with the court.

(b) Identify any issues regarding electronically stored information as to which the parties have been unable to reach an agreement:

N/A

10. If the case is known to involve claims of privilege or protection of trial preparation material,

(a) State whether the parties have reached an agreement regarding the procedures for asserting claims of privilege or protection after production of either electronic or other discovery material:

At a later date, the parties may submit to the court a proposed joint protective order regarding the inadvertent disclosure of identifiable or protected health information and/or a clawback agreement in the event of voluminous electronic discovery to address inadvertent disclosure of privilege.

(b) Briefly describe the terms of any agreement the parties wish to have memorialized in the scheduling order (or attach any separate proposed order which the parties are requesting the Court to enter addressing such matters):

N/A

(c) Identify any issues regarding claims of privilege or protection as to which the parties have been unable to reach an agreement:

N/A

11. State any other matters the Court should include in its scheduling order:

N/A

12. The parties certify by their signatures below that they have discussed the nature and basis of their claims and defenses and the possibilities for prompt settlement or resolution of the case. Please state any specific problems that have created a hindrance to the settlement of the case:

N/A

This 9th day of October, 2018.

Signed: /s/ Gregory R. Nevins
Attorney for Plaintiff

/s/ Katherine P. Stoff
Attorney for Defendant

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF GEORGIA
SAVANNAH DIVISION

JAMEKA K. EVANS

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Plaintiff,

*

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v.

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Civil Action No:

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4:15-CV-00103-JRH-GRS

GEORGIA DEPARTMENT OF
BEHAVIORAL HEALTH AND
DEVELOPMENTAL

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DISABILITIES, and LISA CLARK,

*

In her official capacity, and

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CHARLES MOSS in his individual

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Capacity,

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Defendants.

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SCHEDULING ORDER

COME NOW the parties in the above-styled action and submit this proposed scheduling order as required by the Court’s Order of September 25, 2018, which dismissed all of Plaintiff’s claims in her Second Amended Complaint except claims of unlawful sex discrimination under Section 1983 and Title VII. [Doc. 70]. Defendants’ Answer to the remaining claims in Plaintiff’s Second Amended Complaint was filed on October 9, 2018. Thus, the following proposed deadlines are based on the date the Court entered its order dismissing in part Plaintiff’s

Second Amended Complaint and the filing of Defendants' Answer To Plaintiff's

Second Amended Complaint:

DEADLINES

INITIAL DISCLOSURES UNDER FED. R. CIV. P. 26(A)(1) (14 days after the deadline for Defendants to file Defendants' Answer to Plaintiff's Second Amended Complaint (hereinafter "Answer")):	October 23, 2018
LAST DAY FOR FILING MOTIONS TO AMEND OR ADD PARTIES (60 days after Answer deadline):	November 26, 2018
LAST DAY TO FURNISH EXPERT WITNESS REPORT BY PLAINTIFF (60 days after Answer deadline, but two week extension requested):	December 17, 2018
LAST DAY TO FURNISH EXPERT WITNESS REPORT BY DEFENDANT (90 days after Answer deadline, but two week extension requested):	January 16, 2019
JOINT STATUS REPORT (90 days after 9/25/18 Order):	December 26, 2018
CLOSE OF DISCOVERY(140 days after Answer deadline):	February 26, 2019

LAST DAY FOR FILING CIVIL MOTIONS, INCLUDING <i>DAUBERT</i> MOTIONS, BUT EXCLUDING MOTIONS IN LIMINE (30 DAYS after discovery closes):	March 28, 2019
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s/ _____ (w/express permission)
Gregory R. Nevins
State Bar No: 539529
Counsel for Plaintiff

s/Katherine P. Stoff
Katherine P. Stoff
State Bar No: 536807
Counsel for Defendants

The Court, having reviewed the information contained in the Proposed Scheduling completed and filed jointly by the parties to this action, hereby ADOPTS the parties' plan and MAKES IT THE ORDER OF THE COURT.

SO ORDERED, this ____ day of _____, 2018.

James E. Graham
MAGISTRATE JUDGE